

STEVEN A. SILNUTZER, P.C.
335 E. Jimmie Leeds Road
Bldg. 200, Suite C
Galloway, NJ 08205
(609) 748-6100
Attorney for Debtor:
Steven A. Silnutzer, Esq.

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In RE:)	
)	Case No. 14-20604 (ABA)
)	
MERCADO, Hector J.)	Chapter 13
)	
Debtor)	NOTICE OF MOTION TO ENTER INTO
)	LOSS MITIGATION PROGRAM
)	

Notice to:

Isabel C. Balboa
Chapter 13 Standing Trustee
Cherry Tree Corporate
Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002

Nationstar Mortgage
c/o Stern Lavinthal &
Frankenberg, LLC
Attn: Ashley Rose, Esq.
105 Eisenhower Parkway
Suite 302
Roseland, NJ 07068

Nationstar Mortgage
c/o Shapiro & DeNardo, LLC
Attn: Charles Wohlrab, Esq.
14000 Commerce Parkway
Suite B
Mount Laurel, NJ 08054

TAKE NOTICE that the Debtor, Hector J. Mercado, through his attorney, Steven A. Silnutzer, shall move before the U.S. Bankruptcy Court, 401 Market Street, Camden, New Jersey 08101, on the 3rd day of October 2017 at 10:00am, seeking an order allowing the debtor to enter into the Bankruptcy Loss Mitigation Program on the following grounds: Mr. Mercado is interested in applying for a loan modification that would allow him to retain his home.

The Debtors shall rely on the attached certifications and arguments of counsel. No brief is necessary as the issues herein are straight forward. Oral argument is requested.

Please note that should you object to the relief requested in this motion, that you must serve your written objection no later than seven (7) days prior to the hearing date to the United States Bankruptcy Court, 401 Market Street, 2nd Floor, PO Box 2067, Camden, NJ 08101, and serve a copy to my office as well.

STEVEN A. SILNUTZER, P.C.

Dated: September 11, 2017

/s/ Steven A. Silnutzer, Esq.